

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**DEFENDANT GMAC MORTGAGE LLC'S MOTION TO STRIKE PLAINTIFF'S
MOTION FOR SANCTIONS (DOCKET NO. 83)**

Defendant GMAC Mortgage LLC (“GMACM” or “Defendant”), by counsel, hereby submits its Motion to Strike Plaintiff’s Motion for Sanctions pursuant to Rule 37(c)(1) (“Motion for Sanctions”) (Docket No. 83).

WHEREFORE, for the reasons set forth in Defendant's accompanying Memorandum in Support filed simultaneously, Defendant GMAC Mortgage, LLC, by counsel, respectfully requests that the Court enter an Order: (1) granting its Motion; (2) striking Plaintiff's Motion for Sanctions (Docket No. 83); and (3) granting it such further relief as the Court deems appropriate.

Dated: June 24, 2011

Respectfully Submitted,

GMAC MORTGAGE LLC

By: /s/ John C. Lynch
Of Counsel

John C. Lynch (VSB No. 39267)
Ethan G. Ostroff (VSB No. 71620)
Elizabeth S. Flowers (VSB No. 78487)
Counsel for Defendant GMAC Mortgage LLC
TROUTMAN SANDERS LLP
222 Central Park Avenue, Suite 2000
Virginia Beach, Virginia 23462
Telephone: (757) 687-7500
Facsimile: (757) 687-1597
E-mail: john.lynch@troutmansanders.com
E-mail: ethan.ostroff@troutmansanders.com
E-mail: liz.flowers@troutmansanders.com

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of June, 2011, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

Counsel for Plaintiff

John C. Bazaz, Esq.
Law offices of John Bazaz, PLC
4000 Legato Rd., Suite 1100
Fairfax, VA 22033
E-mail: jbazaz@bazazlaw.com

Leonard Anthony Bennett
Consumer Litigation Assoc PC
12515 Warwick Blvd., Suite 1000
Newport News, Virginia 23606
E-mail: lenbennett@cox.net

Matthew James Erausquin
Consumer Litigation Assoc PC
1800 Diagonal Road, Suite 600
Alexandria, Virginia 22314
E-mail: matt@clalegal.com

Counsel for America Funding, Inc.

Brian Nelson Casey, Esq.
Taylor & Walker PC
555 Main St , PO Box 3490
Norfolk, VA 23514-3490
Email: bcasey@taylorwalkerlaw.com

/s/ John C. Lynch

John C. Lynch (VSB No. 39267)
Counsel for Defendant GMAC Mortgage LLC
TROUTMAN SANDERS LLP
222 Central Park Avenue, Suite 2000
Virginia Beach, Virginia 23462
Telephone: (757) 687-7765
Facsimile: (757) 687-1504
E-mail: john.lynch@troutmansanders.com